

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: HENDRIX FARMING, LLC
Debtor

CHAPTER 11
CASE NO. 23-13663-JDW

**LIMITED RESPONSE AND OBJECTION TO MOTION FOR AUTHORITY
TO SELL REAL PROPERTY OUTSIDE THE ORDINARY COURSE OF
BUSINESS FREE AND CLEAR OF LIENS, CLAIMS AND INTERESTS**

COMES NOW Hendrix Farming, LLC (the “Debtor”), and files this its Limited Response and Objection to its *Motion for Authority to Sell Real Property Outside the Ordinary Course of Business Free and Clear of Liens, Claims and Interests* (the “Motion”) [DK #97] filed by the Debtor, and would respectfully show as follows, to-wit:

1. It may seem strange for the Debtor to object to its own Motion, but the reason it is doing so is it has received a higher and better offer for this same property.
2. Specifically, the verbal offer (not yet reduced to writing) is for the exact same property and the exact same purchase price - however, it is a higher and better offer because there is no commission required of anyone, as opposed to the offer currently before the Court.
3. Debtor’s counsel will inform the original purchaser of this additional offer and will conduct further negotiations if necessary.
4. Other grounds to be assigned upon a hearing hereof, if necessary.

WHEREFORE, PREMISES CONSIDERED, Debtor files this its Limited Response and Objection and prays that upon a hearing hereof this Honorable Court will enter its order granting the Motion to the highest and best purchaser at that point. Debtor prays for general relief.

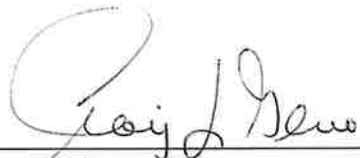
THIS, the 22^d day of April, 2024.

Respectfully submitted,

HENDRIX FARMING, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
LAW OFFICES OF CRAIG M. GENO, PLLC
587 Highland Colony Parkway
Ridgeland, MS 39157
601-427-0048 - Telephone
601-427-0050 - Facsimile
cmgeno@cmgenolaw.com

N:\Firm Data\Users\Bankrupt\Hendrix Farming, LLC\Pleadings\Ltd Resp, Obj re Mot to Sell 346.66 Acres 4-22-24.wpd

CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing to the following:

Sammye S. Tharp, Esq.
Office of the United States Trustee
sammye.s.tharp@usdoj.gov

Jim F. Spencer, Jr., Esq.
jspencer@watkinseager.com

Robert A. Byrd, Esq.
Subchapter V Trustee
rab@byrdwiser.com

Erin A. McManus, Esq.
emcmanus@watkinseager.com

THIS, the 22^d day of April, 2024.


Craig M. Geno